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2/22/2023
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Washington)	
)	
)	
)	
)	
Plaintiff(s),)	
)	
vs.)	Case No.
)	
City of Chicago, et al)	23-cv-1211
)	Judge Kness
)	Magistrate Judge Finnegan
)	RANDOM
Defendant(s).)	

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Vicqui Washington.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, The City of Chicago, et al, is
 (name, badge number if known)

an officer or official employed by Chicago Government;
 (department or agency of government)

or

an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is The City of Chicago. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 08/06/2014, at approximately 12:45 a.m. p.m.
 (month,day, year)
 plaintiff was present in the municipality (or unincorporated area) of Chicago,
Cook, in the County of _____,
 State of Illinois, at I was at home,
 (identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (**Place X in each box that applies**):

- arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- searched plaintiff or his property without a warrant and without reasonable cause;
- used excessive force upon plaintiff;
- failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- failed to provide plaintiff with needed medical care;
- conspired together to violate one or more of plaintiff's civil rights;
- Other:
The Defendant's either individually or as a unit, covered up the high speed CPD chase of Unit #1 that critically injured my sons.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

The Code of Silence

8. Plaintiff was charged with one or more crimes, specifically:

N.A.

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

- are still pending.
- were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____

N.A.

Other: Victim #3 and his family was personally invited by the State's Attorney's Office to the criminal hearing of the driver of Unit #1. There's may have been court proceedings for the owner of Unit #1 as well. My family was never contacted by the State's Attorney's Office and was never invited to court.

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: (*Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.*)

1. August 6, 2014, I was informed that my son (Victim#1) was critically injured in a serious accident. I did not find out that my son, Victim #2, also survived the accident until hours later, after I arrived at Stroger Hospital. My family informed me that Victim #2 also survived.

2. August 7, 2014, a day after arriving with multiple injuries, Victim #1 (Age 16) was discharged from Stroger Hospital with 2 broken bones in his nose and glass still in his face. I had no knowledge that his nose was not reset and that glass was still in his face. Victim #2 (Age 17) sustained brain injury and was discharged on 08/11/2014.

3. On the morning of the accident, a witness at the accident scene told a reporter that a high speed police chase occurred. CPD News Affairs denied the chase of Unit #1.

4. After learning of the chase, I retained Corboy & Demetrio. My attorney confirmed the CPD chase of Unit #1. I was never invited to court. In 2017, I received a few court documents from Corboy & Demetrio for the 1st time .

5. Corboy & Demetrio allowed other law firms to represent my court case without my knowledge or consent. I was asked, but I have never signed a release.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

I have been traumatized so much that it's a miracle I survived. I've had to deal with not only the accident, but the aftermath of the Defendants as well. In 2017, while waiting on my FOIA, I received condolences for the loss of my sons. A few days later, I received a document in the MAIU report that mentioned "MORGUE REPORT"...Everyone survived.

13. Plaintiff asks that the case be tried by a jury. Yes No

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant; **Multiple trauma, loss of opportunities, financial injury, health issues, guilt, grief and humiliation**
- B. (*Place X in box if you are seeking punitive damages.*) Punitive damages against the individual defendant; and **Treble Damages**
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature:

Vicqui Washington

Plaintiff's name (*print clearly or type*): Vicqui Washington

Plaintiff's mailing address: 7235 S. Dobson Ave.

City Chicago State Illinois ZIP 60619

Plaintiff's telephone number: (773) 431-8462

Plaintiff's email address (*if you prefer to be contacted by email*): vicqui_washington@yahoo.com

15. Plaintiff has previously filed a case in this district. Yes No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

[REDACTED] 8:59 AM [REDACTED]

<Inbox



**Fw: RE: Update in regard to
FOIA # P059960.**

---- On Mon, 6/5/17, FOIA

<foia@chicagopolice.org> wrote:

From: FOIA <foia@chicagopolice.org>

Subject: RE: Update in regard to FOIA #
P059960.

To: "vicqui washington"

<[REDACTED]@yahoo.com>

Date: Monday, June 5, 2017, 2:09 PM

#yIv9738524021 #yIv9738524021 --P {

MARGIN-BOTTOM:0px;MARGIN-

TOP:0px;}

#yIv9738524021

Good afternoon Ms. Vicqui,

I am truly sorry for the loss of
your children.



PLAINTIFF'S
EXHIBIT

B2

[REDACTED] 9:00 AM [REDACTED]

< Inbox

Update in regard to...



| politely ask....Why should your
| department pick and choose
| as to what information I receive as the
| mother of two
| innocent children who arrived at Stroger
| unconscious, after
| being cut out of a vehicle?
| I have been waiting since 2014 for
| information as to what
| truly happened to my kids and for some
| reason it seems like
| people are purposely stalling! Olivia, I'm
| not trying to
| be rude nor disrespectful, but how much
| longer will I have
| to wait until you go through
| over 400 documents with a fine tooth
| comb? Everything in
| those documents are a part of the
| investigation of what
| happened to my kids...I'm not
| understanding what's
| going on.



B2

Plaintiff: Vicqui Washington

LIST OF DEFENDANTS

1. City of Chicago, et al
2. Chicago Police Department, et al
3. Sgt. Cornelius Brown #2235, Bt. 6713
4. P.O. Darryl Hardy #16834, Bt. 6713c
5. P.O. Swailiza Manker #19862, Bt.
6. P.O. Kimberly McQuarter #17198,
7. Sgt. Atour Bethishou #2470, Bt. 310 or 320R
8. Sgt. Joaquin Mendoza #2119, Bt. 310 or 320R
9. Sgt. Joseph Kwiatkowski #17550, Bt. 322R
10. P.O. John Hagen # 9335, Bt. 322R
11. P.O. Robert Brown #4510, Bt. 323R
12. P.O. Malcom Bryant #4748, Bt. 323R
13. P.O. Kevin Sheahan #18667, 313R
14. P.O. Michael Butler #16086, Bt. 323R
15. Lt. Darren Doss #450
16. MAIU Sgt. Elliott Musial #910/ #19416, Bt. 5796
17. MAIU Sgt. Timothy Capparelli #1044
18. MAIU T/S Sharon Norway #17643, Bt. 5786

19. MAIU T/S Postelnick #18354, Bt. 5785
20. MAIU Sgt. Paul Sedlacek #2140
21. MAIU T/S Jon Cacciatore #7157, Bt. 5797
22. Office of New Affairs Hector Alfaro #19618
23. City of Chicago Fire Department, et al
24. City of Chicago Department of Law, et al
25. City of Chicago Department of Law- Attorney M. Ruether
26. City of Chicago Department of Law- Attorney Daniel Lim
27. City of Chicago Department of Law- Philip Santell
28. City of Chicago Department of Law- Attorney Marc Augustave
29. City of Chicago Department of Law- Attorney Maggie Mendenhall-
Casey
30. City of Chicago Department of Law- Jason L. Rubin
31. County of Cook, et al
32. John H. Stroger Hospital, et al
33. Cook County State's Attorney's Office, et al
34. Cook County Assistant State's Attorney Krystyn Dilillo
35. Former Cook County State's Attorney Anita Alvarez
36. Corboy & Demetrio, et al
37. Attorney Daniel Kirschner

38. Attorney Thomas Demetrio
39. Attorney Matthew T. Jenkins
40. McDevitt Law P.C., et al f/k/a Dwyer & McDevitt P.C., et al
41. Attorney Daniel McDevitt
42. Attorney Ronald W. Cobb III
43. Attorney John J. Dwyer Jr.
44. Darcy & Devassy P.C., et al f/k/a Askounis & Darcy P.C., et al
45. Attorney D. Alexander Darcy
46. Attorney Thomas V. Askounis

Plaintiff: Vicqui Washington

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42. Attorney John J. Dwyer Jr.
43. Darcy & Devassy P.C., et al f/k/a Askounis & Darcy P.C., et al
44. Attorney D. Alexander Darcy
45. Attorney Thomas V. Askounis